IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS LAREDO DIVISION

JAIME VELA	§	
	§	
Plaintiff,	§	
	§	
VS.	§	C.A. NO. 5:15-CV-239
	§	
VOYAGER INDEMNITY INSURANCE	§	
COMPANY, AMERICAN RELIABLE	§	
INSURANCE COMPANY, VINCENT	§	
MARANO, AND HEATHER ERWIN	§	
	§	
Defendants.	§	

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiff Jaime Vela and Defendants Voyager Indemnity Insurance Company, American Reliable Insurance Company, Vincent Marano and Heather Erwin file this Joint Stipulation of Dismissal with Prejudice, and would respectfully show the Court as follows:

- 1. Plaintiff no longer wishes to pursue this matter.
- 2. Pursuant to Federal Rule of Civil Procedure 41(a), the Parties request the Court enter an Order dismissing all of Plaintiff's claims and causes of action with prejudice.
 - 3. Court costs and attorney fees shall be borne by the party incurring same.

Respectfully submitted,

By: /s/ William J. McCarthy
WILLIAM J. MCCARTHY
SBN 13372500
KENT LIVESAY
SBN 00790057
LAW OFFICES OF R. KENT LIVESAY
5319 South McColl Road
Edinburg, Texas 78539
(956) 992-8721
(956) 686-0050 fax
melissa@livesaylawfirm.com
ATTORNEY FOR PLAINTIFF

By: /s/ Fred L. Shuchart

FRED L. SHUCHART SBN 18316250

COOPER & SCULLY, P.C.

815 Walker St., Suite 1040
Houston Texas 77002
(713) 236-6800
(713) 236-6880 fax
ATTORNEY FOR DEFENDANTS
VOYAGER INDEMNITY INSURANCE
COMPANY, AMERICAN RELIABLE
INSURANCE COMPANY, VINCENT
MARANO AND HEATHER ERWIN

CERTIFICATE OF SERVICE

								document	was	served	on a	all	counsel
of record	for all par	rties via	ECF	on the	18 th d	ay of	January, 2	2016.					

/s/ Fred Shuchart	
FRED L. SHUCHART	